

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Jorge R. Rosario	:	Chapter 13
Ipatia C. Bueno	:	No.: 18-14350-ELF
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY SELENE FINANCE LP

COMES NOW, Debtors, Jorge R. Rosario and Ipatia C. Bueno, hereinafter referred to as “Debtors,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Selene Finance LP, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtors request proof of all post-petition mortgage payments.
9. Denied.
10. Debtors are unsure of the same.
11. Admitted.
12. Denied.
13. Denied.
14. Denied.

15. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: November 25, 2019

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/s/ Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Scott F. Waterman, Esq.**  
Chapter 13 Trustee

**Charles G. Wohlrab, Esq.**  
Electronic Notice  
Attorney for Movant

Dated: October 26, 2020

/s/Brad J. Sadek, Esq.  
Brad J. Sadek, Esq.  
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1315 Walnut Street  
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